

LITE DEPALMA GREENBERG & AFANANDOR, LLC

Joseph J. DePalma
Catherine B. Derenze
570 Broad Street, Suite 1201
Newark, NJ 07102
Telephone: 973-623-3000
Facsimile: 973-623-0858
jdepalma@litedepalma.com
cderenze@litedepalma.com

Attorney for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,
Individually and on Behalf of All Others Similarly
Situated,

Plaintiffs,

v.

CEASERS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a CEASERS
ATLANTIC CITY HOTEL & CASINO, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC
d/b/a HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA CASINO
AND RESORT ATLANTIC CITY, MGM RESORTS
INTERNATIONAL, MARINA DISTRICT
DEVELOPMENT COMPANY, LLC d/b/a
BORGATA HOTEL CASINO & SPA, HARD ROCK
INTERNATIONAL INC., SEMINOLE HARD
ROCK SUPPORT SERVICES, LLC, BOARDWALK
1000, LLC d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

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: Civil Action No.: 1:23-cv-02536-KMW-EAP
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: **NOTICE OF MOTION FOR *PRO HAC***
: ***VICE* ADMISSION OF CHRISTOPHER J.**
: **CORMIER, SPENCER COX, WARREN T.**
: **BURNS, DANIEL H. CHAREST,**
: **MATTHEW TRIPOLITSIOTIS, HANNAH**
: **M. CROWE AND QUINN BURNS**

PLEASE TAKE NOTICE that on July 17, 2023 at 10:00 a.m., or as soon thereafter as
counsel may be heard, Heather Altman and Eliza Wiatroski ("Plaintiffs") will move before
Honorable Elizabeth A. Pascal, U.S.M.J. at the United States District Court, Mitchell H. Cohen

Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101, for an order admitting Christopher J. Cormier, Spencer Cox, Warren T. Burns, Daniel H. Charest, Matthew Tripolitsiotis, Hannah M. Crowe, Quinn Burns; and it appearing that Christopher J. Cormier is a partner with the firm Burns Charest LLP, located at 4725 Wisconsin Avenue, NW, Suite 200, Washington, DC 20016; Spencer Cox is a partner with the firm Burns Charest LLP, located at 4725 Wisconsin Avenue, NW, Suite 200, Washington, DC 20016; Warren T. Burns is a partner with the firm Burns Charest LLP, located at 900 Jackson Street, Suite 500, Dallas, TX 75202; Daniel H. Charest is a partner with the firm Burns Charest LLP, located at 900 Jackson Street, Suite 500, Dallas, TX 75202; Hannah M. Crowe is an associate with the firm Burns Charest LLP, located at 900 Jackson Street, Suite 500, Dallas, TX 75202; Matthew Tripolitsiotis is a partner with the firm Burns Charest LLP, located at 900 Jackson Street, Suite 500, Dallas, TX 75202; Quinn Burns is an associate with the firm Burns Charest LLP, located at 900 Jackson Street, Suite 500, Dallas, TX 75202, *pro hac vice* for all purposes in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that in support of Plaintiffs' motion are the Certifications of Joseph J. DePalma, Christopher J. Cormier, Spencer Cox, Warren T. Burns, Daniel H. Charest, Matthew Tripolitsiotis, Hannah M. Crowe and Quinn Burns. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that because this application being made is pursuant to Local Rule 101.1(c) and is within the discretion of the Court, no brief is necessary.

PLEASE TAKE FURTHER NOTICE that Plaintiffs hereby request that this motion be decided on the papers pursuant to Rule 78 of the Federal Rules of Civil Procedure.

LITE DEPALMA GREENBERG & AFANADOR, LLC

Dated: June 16, 2023

/s/ Joseph J. DePalma
Joseph J. DePalma
570 Broad Street, Suite 1201
Newark, New Jersey 07102
(973) 623-3000
bgreenberg@litedepalma.com

Attorney for Plaintiffs and the Proposed Class